

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

IN RE	Chapter 11
CARIBBEAN PETROLEUM LP	Bk. Case No. 01-11657 (PJW)
Debtor(s)	Adv. No. 03-60026
HERNAN SERRANO, TRUSTEE OF THE CARIBBEAN PETROLEUM CREDITORS' TRUST AND ON BEHALF OF THE ESTATES OF THE ABOVE CAPTIONED DEBTORS, ET. AL., AS AUTHORIZED REPRESENTATIVE	Jointly Administered
Plaintiff,	Civ No. 04-433-SLR
v.	
CAMIONEROS COOPERATIVA DE TRANSPORTE DE CARGA; COOP CAMIONEROS TRANSPORTE	
Defendant	

MOTION FOR EXTENSION OF TIME TO SHOW CAUSE

COMES NOW Camioneros Cooperativa de Transporte de Carga through the undersigned counsel and respectfully show, alleges and pray:

1. That this Honorable Court entered and order directing defendants to show cause why judgement shall not be entered against for having fail to retain local counsel and having fail to respond to plaintiff's pending motion for summary judgement.
2. That plaintiff's request an extension of 15 days to answer and comply with the order to show cause.
3. That the plaintiff's did retain local counsel however there a conflict on the type of involvement local counsel would have.

4. The undersigned request an additional 15 days to respond to the order to show cause and to properly retain local counsel.

5. The plaintiff's through the undersigned recognizes that there has been delays in the present case which among other were due to certain problems that the undersigned encountered which will be alleged in additional detail when the motion in compliance with order to show cause is filed.

6. Although there have been certain delays due to facts which will more fully explain no party will be prejudice if the extension requested be granted and the Honorable Court will be in a better position to make a determination based on all facts before it.

7. Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure the court may enlarge the time period in question.

8. Ordinarily of Course, the court should be liberal in granting extensions of time, so long as the moving party has not been guilty of negligence of bad faith and the privilege has not been abused.

9. The plaintiff has not been guilty on negligence or bad faith 9but for circumstances out of the control of plaintiff's counsel), nor has the privilege been abused by the Debtor.

10. The parties would not be prejudiced should the enlargement requested be granted.

WHEREFORE the Plaintiff respectfully pray that this Honorable Court's grants the extension of time requested and that the debtor's have any and other relief as is just.

RESPECTFULLY SUBMITTED

This September 12, 2005

s/ Irving K. Hernandez Valls
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that at this same day I have caused a true and exact copy of this to be mailed by regular prepaid postage to Bruce Groshgal, Laura Davis Jones, 919 North Market Street, 16th Floor, PO Box 8705, Wilmington, Delaware 19899-8705 and by electronic means and to Camioneros, Cooperativa de Transporte de Carga, PO Box 13877, Santurce, PR 00908-3877.

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